

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 04-11456-RWZ

GENERAL ELECTRIC MORTGAGE
INSURANCE CORPORATION,
Plaintiff,
Judgment Creditor

V.

CHI CHEN A/K/A CHEN HU,
A/K/A TRACY CHEN,
Defendant,
Judgment Debtor

AFFIDAVIT OF MICHAEL B. FEINMAN

I, Michael B. Feinman, being under oath hereby state the following:

1. I am an attorney in good standing of the Commonwealth of Massachusetts.
2. I am employed by Feinman Law Offices.
3. Either myself, or my associate, Stephen P. Shannon, has worked on the above-captioned matter for the interested party, Ching Yee M. Tsui ("Tsui"), in this matter, and also including representation of Tsui in related state court matters concerning this Plaintiff and Tsui, despite the fact that Tsui is not a party to any of these related matters, except an action filed only recently, on August 4, 2005 in the Suffolk County Superior Court.
4. As of July 31, 2005, total legal fees and costs have been billed in the above-captioned matter in the estimated amount of \$22,536.25. In addition, unbilled legal fees in the amount of approximately \$843.33 have been incurred in

connection with the preparation of the Motion For Sanctions against Plaintiff's Counsel, filed herewith, bringing the total of legal fees and costs to an amount of approximately \$23,379.58. A detailed list of attorney's fees will be provided at any hearing scheduled on said Motion For Sanctions.

Signed under the pains and penalties of perjury this 17th day of August, 2005.

/s/ Michael B. Feinman

Michael B. Feinman

04x3791\USDistCt\affidavitattyfees.doc